

Exhibit 1

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dba Columbia River Knife & Tool Company*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

CV'07 - 731 AA

**GB II CORPORATION, dba COLUMBIA
RIVER KNIFE & TOOL COMPANY**
an Oregon corporation,

Civil No. _____

Plaintiff,

**COMPLAINT
FOR PATENT INFRINGEMENT**

v.

DEMAND FOR JURY TRIAL

**GREAT AMERICAN TOOL COMPANY,
INC.**
a New York corporation,

Defendant.

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff GB II Corporation, dba Columbia River Knife & Tool Company ("CRKT"), by and through its undersigned counsel, respectfully makes the following allegations for its Complaint against Defendant Great American Tool Company, Inc. ("GATCO"). These allegations are made upon knowledge with respect to Plaintiff CRKT and its own acts, and upon information and belief as to all other matters.

PARTIES

1. CRKT is an Oregon corporation having its principal place of business in Wilsonville, Oregon.
2. Defendant GATCO is a New York corporation having its principal place of business at 665 Hertel Avenue, Buffalo, New York, 14207.

JURISDICTION

3. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1338.
4. In light of its contacts with Oregon, GATCO is subject to the personal jurisdiction of this Court. GATCO is further subject to personal jurisdiction since, upon information and belief, GATCO has committed acts of infringement as alleged herein in this jurisdiction.
5. Pursuant to 28 U.S.C. §§ 1391 and 1400(b), this Court is a proper venue for this action.

BACKGROUND

6. On December 28, 2004, U.S. Patent No. 6,834,432 ("the '432 patent") was duly and legally issued to William Joseph Taylor, Jr. A copy of the '432 patent is attached hereto as Exhibit A.

7. Plaintiff CRKT has been assigned the entire right, title, and interest in the '432 patent.

COUNT ONE - PATENT INFRINGEMENT

8. CRKT incorporates the allegations stated in Paragraphs 1-7 as if fully set forth herein.

9. CRKT has never licensed or permitted GATCO to practice any of the legal rights granted under the '432 patent.

10. Upon information and belief, GATCO infringes the '432 patent by making, using, offering for sale, importing, and/or selling in the United States, folding knives, under 35 U.S.C. § 271(a).

11. Upon information and belief, GATCO is currently selling such folding knives as the "Vallotton/Ochs Kickstart" knife.

12. Upon information and belief, GATCO is actively inducing its customers to infringe, under 35 U.S.C. § 271(b).

13. CRKT will suffer irreparable damage due to the infringing acts of GATCO, unless GATCO is enjoined by this Court from those acts which infringe the '432 patent.

14. CRKT is suffering and has suffered monetary damage as a result of GATCO's infringement of the '432 patent.

15. CRKT has marked its patented product pursuant to 35 U.S.C. § 287.

16. Upon information and belief, GATCO is aware of the existence of the '432 patent.

17. CRKT is informed and believes, and on this basis alleges, that GATCO is infringing, and upon information and belief will continue to infringe, unless enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff CRKT prays for the following relief:

- (1) A judicial determination that GATCO has infringed the '432 patent pursuant to 35 U.S.C. § 271;
- (2) A preliminary injunction enjoining GATCO, its agents, officers, assigns and others acting in concert with GATCO from: infringing, inducing infringement of, and/or contributing to infringement of the '432 patent.
- (3) A permanent injunction enjoining GATCO, its agents, officers, assigns and others acting in concert with GATCO from: infringing, inducing infringement of, and/or contributing to infringement of the '432 patent.
- (4) An award of damages, reflecting an accounting of damages, to compensate CRKT for the acts complained of herein, including damages under 35 U.S.C. § 154(d)(1).
- (5) An award of pre-judgment interest and post-judgment interest on the damages awarded;
- (6) Such other and further relief as the Court deems just.

JURY DEMAND

Pursuant to Fed. R. Civ. P. 38 and Local Rule 38.1(b), Plaintiff CRKT demands a jury trial on all issues triable to a jury.

Respectfully submitted,

Dated: May 17, 2007

By:



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